

## **FWS Comments for "BDCP Effects Analysis Review" 10/25-26/2011**

Good afternoon, members of the panel. I'm going to articulate the Fish and Wildlife Service's perspective on this review. My comments are intended to be read as part of the package of comments you're hearing from the Department of Fish and Game, the Fish and Wildlife Service, and NOAA Fisheries. We agree with Scott's comments and those Mike Tucker will deliver when I'm done.

The documents that you have been charged to review represent elements of a larger effects analysis product that is currently under preparation. As we understand the process, you will later be charged with the review of the entire effects analysis, including a critical synthetic document called the "roll up" that attempts to integrate the various elements of the analysis. The Service has a strong interest in the quality of the effects analysis, as it will be key element in the package of information that we will analyze when we are asked to determine whether the BDCP is permissible.

Because ICF has not had a chance to incorporate advice on the entrainment appendix that we provided on September 14<sup>th</sup>, your panel report will be more valuable to us if you consider our comments and recommendations during your review. We have provided the Delta Science Program electronic copies of the combined federal comments, and have some hardcopies of those comments for distribution should you wish.

The BDCP is a critical undertaking, and the Service is committed to its success. Several questions are of special interest to us in the present review.

First, with regard to the conceptual framework.

- Do the foundation and framework adequately describe how conceptual and quantitative models will be used, and in enough detail that we can assess whether they are reasonable and defensible?
- How will the Effects Analysis relate project effects to the biological goals and objectives that are being developed, to ensure that the plan adopts objectives that are SMART; that is, specific, measurable, attainable, relevant, and time-limited?
- How will the effects analysis deal with situations where modeling approaches have been proposed that indicate there are underlying conflicts in conceptual models for biological phenomena?
- How will the effects analysis deal with the high levels of scientific uncertainty associated with key issues?

Second, with regard to the draft entrainment appendix.

- How well was the foundation and framework applied, and does your review of the entrainment appendix suggest changes or refinements to the analytical framework or approach to developing these products for future appendix review?

- Are the suggested methods of estimating entrainment mutually exclusive, and are there any other methods that have been neglected that should be investigated?
- Were the conclusions drawn from the results accurate, and was uncertainty appropriately propagated, evaluated, and disclosed?

The enormous scope and complexity of the BDCP make the analytical challenges that ICF, the agencies, and stakeholders face very daunting. We view the development of the products that you have been charged to review as a fundamentally iterative process. Because the Service has committed to achieving a quality product on schedule, we appreciate any assistance or guidance the panel can provide to help us minimize the number of development-and-review iterations that are required to reach closure.

In closing, we appreciate the panel's assistance in this difficult undertaking and look forward to reading your report.